



Tennessee Valley Authority, Post Office Box 2000, Soddy-Daisy, Tennessee 37379-2000

October 26, 2004

Mr. Mark McAdoo  
State of Tennessee  
Department of Environment and Conservation  
Division of Water Pollution Control  
Enforcement & Compliance Section  
6<sup>th</sup> Floor, L&C Annex  
401 Church Street  
Nashville, Tennessee 37243-1534

Mr. McAdoo:

**2004 DISCHARGE MONITORING REPORT – QUALITY ASSURANCE (DMR-QA) STUDY 24  
PROVIDER-GRADED TEST RESULTS**

Please find enclosed the provider-graded test results of the 2004 DMR-QA Study 24 Laboratory Performance Evaluation obtained by TVA Sequoyah Nuclear Plant and supporting Laboratories as required by NPDES Permit TN0026450.

Please contact me at (423) 843-6700 if you have any questions or comments.

Sincerely,

A handwritten signature in black ink that reads "Stephanie A. Howard".

Stephanie A. Howard  
Principal Environmental Engineer  
Signatory Authority for  
J. Randy Douet  
Site Vice President  
Sequoyah Nuclear Plant

Enclosure  
cc (Enclosure)

Mr. Wayne Turnbull  
EPA Region IV  
ESD/ASB/LE&QAS  
980 College Station Road  
Athens, Georgia 30605-2720

Chattanooga Environmental Assistance Center  
Division of Water Pollution Control  
State Office Building, Suite 550  
540 McCallie Avenue  
Chattanooga, Tennessee 37402-2013

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D.C. 20555

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October 19, 2004

Stephanie A Howard  
Tennessee Valley Authority  
PO Box 2000 SB-2A  
Sequoyah Nuclear Plant  
Soddy Daisy, TN 37384-2000

Enclosed is your final report for ERA's Proficiency Testing Study, DMR-QA 24. Your final report includes an evaluation of every result submitted by your facility to ERA. Please note that reports were sent on your behalf to both the USEPA DMR-QA office, and your state or regional DMR-QA Coordinator.

If you have any "Not Acceptable" evaluations for the DMR-QA 24 Study, a letter of corrective action and an order form for the required remedial samples are attached for your convenience. If there is no order form or standards listed for your in-house or outside laboratories, then ERA recommends that you contact your DMR QA Coordinator for their corrective action requirements. This concludes the DMR-QA 24 Study.

Thank you for your participation in ERA's Proficiency Testing Study, DMR-QA 24. If you have any questions, please contact myself or Curtis Wood, Quality Assurance Director, at 1-800-372-0122.

Sincerely,

Shawn Kassner  
Proficiency Testing Manager

attachments  
smk



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In my role as ERA's Quality Assurance Director, I have ensured that all aspects of ERA's Proficiency Testing Study, DMR-QA 24, have been reviewed for compliance with all USEPA technical and program requirements in effect during this study. To all of you who were asked to provide additional information as we were processing your data packages, thank you for your patience and assistance.

All aspects of ERA's DMR-QA 24 Study, from standard manufacture to final report generation, were completed by ERA in accordance with the "National Standards for Water Proficiency Testing Studies Criteria Document", USEPA December 30, 1998. ERA has reviewed all of the data that is contained in this report and has made every possible effort to make it complete, accurate and compliant. However, if you find anything in your report that you feel is incomplete or inaccurate or have any quality related issues, please call me directly at 1-800-372-0122. As required by ERA Standard Operating Procedure for Handling Product and Service Problems (SOP 0150, Rev.7.0), we will initiate an internal investigation and take corrective action as appropriate.

Sincerely,

Curtis J. Wood  
Quality Assurance Director

ERA Study: **DMR-QA 24**

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Permittee Name:

**Tennessee Valley Authority**

NPDES Permit Number: **TN0026450**

Customer Code: **T2033-02**

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Report Prepared by:  
Environmental Resource Associates  
Arvada, Colorado

October 19, 2004



NPDES Permit Number: TN0026450

Customer Code: T2033-02

Report Issued: 10/19/04

Study Dates: 06/03/04 - 09/03/04

## DMRQA Study Definitions:

The Reported Value is the value that the laboratory reported to ERA.

The ERA Assigned Values were established per the USEPA's guidelines contained in the National Standards for Water Proficiency Testing Studies Criteria Document, December 1998.

The Acceptance Limits and Warning Limits are established per the USEPA's guidelines contained in the National Standards for Water Proficiency Testing Studies Criteria Document, December 1998.

The Performance Evaluation:

Acceptable = Reported Value falls within the Acceptance Limits.

Not Acceptable = Reported Value falls outside the Acceptance Limits.

Check for Error = Reported Value falls within the Acceptance Limits and outside of the Warning Limits

No Evaluation = Reported Value cannot be evaluated

The Method Description is the method the laboratory reported to ERA.

## DMRQA Study Discussion:

ERA's DMR-QA 24 Study has been reviewed by ERA Senior Management and certified compliant with the requirements of the USEPA's National Standards for Water Proficiency Testing Studies Criteria Document (December 1998). ERA is a NIST NVLAP accredited PT Provider (Lab Code 200386-0).

ERA's DMR-QA 24 Study standards were examined for any study anomalies. A full review of all homogeneity, stability, and accuracy verification data was completed. All analytical verification data for all analytes in ERA's DMR-QA 24 standards met the acceptance criteria contained in the USEPA's National Criteria Document for Water Proficiency Testing Studies, December 1998.

The data submitted by participating laboratories was also examined for study anomalies. There were no study anomalies found during the review of the study data.

The DMR-QA 24 Study report shall not be reproduced except in its entirety and not without the permission of the participating laboratory. The report must not be used by the participating laboratory to claim product endorsement by NVLAP or any agency of the U. S. government.

If you have any questions regarding ERA's DMR-QA 24 Study, please contact Shawn Kassner, Proficiency Testing Manager, or Curtis Wood, Quality Assurance Director, at 1-800-372-0122.

NPDES Permit #: TN0026450

Customer Code: T2033-02

Permit Holder: **STEPHANIE A HOWARD**  
**PRINCIPAL ENV ENGINEER**  
**TENNESSEE VALLEY AUTHORITY**  
**PO BOX 2000 SB-2A**  
**SEQUOYAH NUCLEAR PLANT**  
**SODDY DAISY, TN 37384-2000**  
**423-843-6700**

Report Issued: 10/19/04  
 Study Dates: 06/03/04 - 09/03/04

Analyte	Performance Evaluation	Reported Value	Assigned Value	Acceptance Limits	Warning Limits	Units	Method Description	USEPA Lab Code	Study
<b>Trace Metals</b>									
Aluminum †			520	435 - 605	463 - 577	µg/L			DMRQA024
Arsenic †			302	251 - 355	268 - 338	µg/L			DMRQA024
Cadmium †			218	185 - 248	196 - 238	µg/L			DMRQA024
Chromium †			280	242 - 318	255 - 305	µg/L			DMRQA024
Cobalt †			409	359 - 459	376 - 442	µg/L			DMRQA024
Copper †	Check for Error	324	348	314 - 384	326 - 372	µg/L	EPA 220.2	TN00016	DMRQA024
Iron †	Acceptable	454	454	398 - 517	418 - 497	µg/L	EPA 200.7	TN00016	DMRQA024
Lead †			321	277 - 364	291 - 350	µg/L			DMRQA024
Manganese †			252	225 - 280	234 - 271	µg/L			DMRQA024
Mercury †			11.2	8.36 - 14.0	9.30 - 13.1	µg/L			DMRQA024
Nickel †			538	483 - 603	503 - 583	µg/L			DMRQA024
Selenium †			822	653 - 952	702 - 902	µg/L			DMRQA024
Vanadium †			321	287 - 352	298 - 341	µg/L			DMRQA024

† Indicates analytes included in ERA's NIST/NVLAP accreditation. Lab Code 200386-0



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Analyte	Performance Evaluation	Reported Value	Assigned Value	Acceptance Limits	Warning Limits	Units	Method Description	USEPA Lab Code	Study
<b>Trace Metals (Continued)</b>									
Zinc †			648	573 - 730	599 - 704	µg/L			DMRQA024
<b>Demands</b>									
BOD †			75.3	38.0 - 113	50.4 - 100	mg/L			DMRQA024
CBOD †			64.8	29.1 - 101	41.0 - 88.7	mg/L			DMRQA024
COD †			121	91.2 - 140	99.3 - 132	mg/L			DMRQA024
TOC †			47.9	40.0 - 55.2	42.5 - 52.7	mg/L			DMRQA024
<b>Nutrients</b>									
Ammonia as N †			17.2	13.4 - 20.8	14.6 - 19.6	mg/L			DMRQA024
Nitrate as N †			11.4	9.02 - 13.5	9.77 - 12.8	mg/L			DMRQA024
Ortho-phosphate as P †			2.50	2.13 - 2.89	2.26 - 2.77	mg/L			DMRQA024
Total Kjeldahl Nitrogen †			16.7	12.1 - 20.7	13.6 - 19.3	mg/L			DMRQA024
Total phosphorus as P †	Acceptable	3.46	3.67	2.79 - 4.31	3.04 - 4.06	mg/L	EPA 365.4	TN00016	DMRQA024

† Indicates analytes included in ERA's NIST/NVLAP accreditation. Lab Code 200386-0



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Analyte	Performance Evaluation	Reported Value	Assigned Value	Acceptance Limits	Warning Limits	Units	Method Description	USEPA Lab Code	Study
<b>Miscellaneous Analytes</b>									
Total Residual Chlorine †	Acceptable	1.17	1.14	0.890 - 1.39	0.974 - 1.31	mg/L	EPA 330.4	TN00999	DMRQA024
Cyanide, total †			0.574	0.397 - 0.740	0.454 - 0.682	mg/L			DMRQA024
pH †	Check for Error	8.18	8.43	8.18 - 8.67	8.26 - 8.59	S.U.	EPA 150.1	TN00999	DMRQA024
Phenolics, total †			1.32	0.726 - 1.91	0.923 - 1.71	mg/L			DMRQA024
Non-filterable residue / TSS †	Acceptable	80	89.9	69.8 - 97.1	74.4 - 92.6	mg/L	EPA 160.2	TN00016	DMRQA024
Grease & Oil (Gravimetric) †	Acceptable	21	24.0	14.5 - 29.0	16.9 - 26.6	mg/L	EPA 1664A	TN00016	DMRQA024
Grease & Oil (Infrared) †			29.5	18.6 - 34.7	21.3 - 32.0	mg/L			DMRQA024

† Indicates analytes included in ERA's NIST/NVLAP accreditation. Lab Code 200386-0





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Analyte	Performance Evaluation	Reported Value	Assigned Value	Acceptance Limits	Warning Limits	Units	Method Description	USEPA Lab Code	Study
<b>Additional Analytes</b>									
Antimony †			417	289 - 503	325 - 468	µg/L			DMRQA024
Barium			618	531 - 704		µg/L			DMRQA024
Beryllium †			210	178 - 237	188 - 227	µg/L			DMRQA024
Boron	Acceptable	709	667	541 - 854		µg/L	EPA 200.7	TN00016	DMRQA024
Molybdenum †			113	94.8 - 130	101 - 124	µg/L			DMRQA024
Silver †			151	129 - 173	136 - 166	µg/L			DMRQA024
Strontium †			163	138 - 187	147 - 179	µg/L			DMRQA024
Thallium †			704	568 - 816	609 - 775	µg/L			DMRQA024
Calcium †			35.4	31.5 - 40.3	32.9 - 38.8	mg/L			DMRQA024
Magnesium †			24.2	21.2 - 27.1	22.1 - 26.1	mg/L			DMRQA024
Calcium Hardness (CaCO <sub>3</sub> )			88.4	74.2 - 105		mg/L			DMRQA024
Total Hardness (CaCO <sub>3</sub> ) †			188	171 - 206	177 - 200	mg/L			DMRQA024
Nitrate + Nitrite as N			11.4	9.02 - 13.5		mg/L			DMRQA024

† Indicates analytes included in ERA's NIST/NVLAP accreditation. Lab Code 200386-0



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Anal. Test Conditions No.	Test Endpoint	Performance Evaluation	Reported Value	Assigned Value	Acceptance Limits	Units	Method Description	USEPA Lab Code
<b>Fathead minnow (Method Code 15)</b>								
0756 7-day Short term Chronic, Daily Renewal, MHSF	NOEC Survival			50.0	12.5 - 100	%		
0808 7-day Short term Chronic, Daily Renewal, MHSF	IC25 (ON) Growth	Acceptable	51.8	39.5	13.1 - 65.9	%	EPA 1000	NC01230
0809 7-day Short term Chronic, Daily Renewal, MHSF	IC25 (SN) Growth			43.2	15.4 - 71.0	%		
0810 7-day Short term Chronic, Daily Renewal, MHSF	NOEC (ON) Growth			25.0	12.5 - 50.0	%		
0811 7-day Short term Chronic, Daily Renewal, MHSF	NOEC (SN) Growth			25.0	12.5 - 50.0	%		
<b>Ceriodaphnia dubia (Method Code 21)</b>								
0766 7-day Short term Chronic, Daily Renewal, MHSF	NOEC Survival			25.0	12.5 - 50.0	%		
0767 7-day Short term Chronic, Daily Renewal, MHSF	IC25 Reproduction	Acceptable	30.7	26.0	14.6 - 37.4	%	EPA 1002	NC01230
0768 7-day Short term Chronic, Daily Renewal, MHSF	NOEC Reproduction			25.0	12.5 - 50.0	%		

All analytes are included in ERA's NIST/NVLAP (200386-0) and A2LA (1539-01) accreditations.



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Anal. Test Conditions No.	Test Endpoint	Reference Toxicant Code	Reference Toxicant Name	Total # Reported	Total # Acceptable	Total # Not Acceptable	Total # No. Eval.	Study Failure Rate
<b>Fathead minnow (Test Code 11)</b>								
0752 48Hr., Acute, Non-Renewal, 20° C, MHSF	LC50	004	(NH4)2HPO4	53	52	1	0	1.89
<b>Fathead minnow (Test Code 13)</b>								
0754 48Hr., Acute, Non-Renewal, 25° C, MHSF	LC50	004	(NH4)2HPO4	60	58	2	0	3.33
<b>Fathead minnow (Test Code 14)</b>								
0755 48Hr., Acute, Non-Renewal, 25° C, 20% DMW	LC50	004	(NH4)2HPO4	18	16	2	0	11.1
<b>Fathead minnow (Test Code 15)</b>								
0756 7-day Short term Chronic, Daily Renewal, MHSF	NOEC Survival	004	(NH4)2HPO4	65	64	1	0	1.54
0808 7-day Short term Chronic, Daily Renewal, MHSF	IC25 (ON) Growth	004	(NH4)2HPO4	57	53	4	0	7.02
0809 7-day Short term Chronic, Daily Renewal, MHSF	IC25 (SN) Growth	004	(NH4)2HPO4	27	24	3	0	11.1
0810 7-day Short term Chronic, Daily Renewal, MHSF	NOEC (ON) Growth	004	(NH4)2HPO4	59	58	1	0	1.69
0811 7-day Short term Chronic, Daily Renewal, MHSF	NOEC (SN) Growth	004	(NH4)2HPO4	30	29	1	0	3.33

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Anal. Test Conditions No.	Test Endpoint	Reference Toxicant Code	Reference Toxicant Name	Total # Reported	Total # Acceptable	Total # Not Acceptable	Total # No. Eval.	Study Failure Rate
<b>Fathead minnow (Test Code 16)</b>								
0759 7-day Short term Chronic, Daily Renewal, 20% DMW	NOEC Survival	001	KCl	19	16	3	0	15.8
0812 7-day Short term Chronic, Daily Renewal, 20% DMW	IC25 (ON) Growth	001	KCl	19	17	2	0	10.5
0813 7-day Short term Chronic, Daily Renewal, 20% DMW	IC25 (SN) Growth	001	KCl	11	8	3	0	27.3
0814 7-day Short term Chronic, Daily Renewal, 20% DMW	NOEC (ON) Growth	001	KCl	17	15	2	0	11.8
0815 7-day Short term Chronic, Daily Renewal, 20% DMW	NOEC (SN) Growth	001	KCl	12	10	2	0	16.7
<b>Ceriodaphnia dubia (Test Code 17)</b>								
0762 48Hr., Acute Renewal, 20° C, MHSF	LC50	001	KCl	13	13	0	0	0.00
<b>Ceriodaphnia dubia (Test Code 18)</b>								
0763 48Hr., Acute Renewal, 20° C, 20% DMW	LC50	001	KCl	7	7	0	0	0.00
<b>Ceriodaphnia dubia (Test Code 19)</b>								
0764 48Hr., Acute Renewal, 25° C, MHSF	LC50	001	KCl	52	47	5	0	9.62

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<b>Ceriodaphnia dubia (Test Code 20)</b>								
0765 48Hr., Acute Renewal, 25° C, 20% DMW	LC50	001	KCl	19	17	2	0	10.5
<b>Ceriodaphnia dubia (Test Code 21)</b>								
0766 7-day Short term Chronic, Daily Renewal, MHSF	NOEC Survival	001	KCl	64	63	1	0	1.56
0767 7-day Short term Chronic, Daily Renewal, MHSF	IC25 Reproduction	001	KCl	62	59	3	0	4.84
0768 7-day Short term Chronic, Daily Renewal, MHSF	NOEC Reproduction	001	KCl	64	59	5	0	7.81
<b>Ceriodaphnia dubia (Test Code 22)</b>								
0769 7-day Short term Chronic, Daily Renewal, 20% DMW	NOEC Survival	001	KCl	26	25	1	0	3.85
0770 7-day Short term Chronic, Daily Renewal, 20% DMW	IC25 Reproduction	001	KCl	29	19	10	0	34.5
0771 7-day Short term Chronic, Daily Renewal, 20% DMW	NOEC Reproduction	001	KCl	27	26	1	0	3.70
<b>Daphnia magna (Test Code 32)</b>								
0788 48Hr., Acute, Non-Renewal, 20° C, MHSF	LC50	001	KCl	21	18	3	0	14.3

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Anal. Test Conditions No.	Test Endpoint	Reference Toxicant Code	Reference Toxicant Name	Total # Reported	Total # Acceptable	Total # Not Acceptable	Total # No. Eval.	Study Failure Rate
<b>Daphnia pulex (Test Code 36)</b>								
0792 48Hr., Acute, Non-Renewal, 20° C, MHSF	LC50	001	KCI	16	15	1	0	6.25
<b>Daphnia pulex (Test Code 38)</b>								
0794 48Hr., Acute, Non-Renewal, 25° C, MHSF	LC50	001	KCI	26	24	2	0	7.69
<b>Mysid (Test Code 42)</b>								
0798 48Hr., Acute, Non-Renewal, 20° C, 40 FSW	LC50	001	KCI	33	33	0	0	0.00
<b>Mysid (Test Code 43)</b>								
0799 7-day Short term Chronic, Daily Renewal, 40 FSW	NOEC Survival	001	KCI	23	22	1	0	4.35
0816 7-day Short term Chronic, Daily Renewal, 40 FSW	IC25 (ON) Growth	001	KCI	20	19	1	0	5.00
0817 7-day Short term Chronic, Daily Renewal, 40 FSW	IC25 (SN) Growth	001	KCI	14	13	1	0	7.14
0818 7-day Short term Chronic, Daily Renewal, 40 FSW	NOEC (ON) Growth	001	KCI	20	19	1	0	5.00
0819 7-day Short term Chronic, Daily Renewal, 40 FSW	NOEC (SN) Growth	001	KCI	14	12	2	0	14.3

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<b>Inland silverside (Test Code 44)</b>								
0803 48Hr., Acute, Non-Renewal, 20° C, 40 FSW	LC50	001	KCI	32	32	0	0	0.00
<b>Sheepshead minnow (Test Code 46)</b>								
0804 48Hr., Acute, Non-Renewal, 20° C, 40 FSW	LC50	001	KCI	11	11	0	0	0.00
<b>Sheepshead minnow (Test Code 47)</b>								
0805 7-day Short term Chronic, Daily Renewal, 40 FSW	NOEC Survival	001	KCI	10	10	0	0	0.00
0820 7-day Short term Chronic, Daily Renewal, 40 FSW	IC25 (ON) Growth	001	KCI	9	9	0	0	0.00
0821 7-day Short term Chronic, Daily Renewal, 40 FSW	IC25 (SN) Growth	001	KCI	4	4	0	0	0.00
0822 7-day Short term Chronic, Daily Renewal, 40 FSW	NOEC (ON) Growth	001	KCI	9	9	0	0	0.00
0823 7-day Short term Chronic, Daily Renewal, 40 FSW	NOEC (SN) Growth	001	KCI	5	5	0	0	0.00